

## **REMARKS**

Reconsideration of the objections and rejections set forth in the Office Action mailed September 5, 2006 is respectfully requested.

In the Office Action mailed April 5, 2006, the Examiner indicated that the claims were misnumbered, and the Examiner indicated that the claims were renumbered as claims 1-19. In Amendment A, Applicant cancelled the rejected claims and rewrote the one claim (claim 15, still misnumbered, as claim 178) indicated as having allowable subject matter. Now, the claim indicated as reciting allowable subject matter has been rejected. As a result, Applicant has decided to effectively reinstate all of the previously-cancelled claims. (Given that cancelled claims cannot be reinstated with the same claim numbering, Applicant has reinstated former claims 1-19 (i.e., misnumbered claims 27, and 165-181 and 184) as new claims 20-38, respectively.

In reinstating the former claims, Applicant has made clarifying amendments to the claims. While not intending to limit or otherwise affect the scope of the amendments actually made, we briefly discuss some examples of the amendments here. For example, one such clarification is that claim 20 (equivalent to former claim 1, misnumbered as claim 27) recites that an “X.500 compatible enterprise directory ... is a directory of named objects, including users, network devices and network services”. See, for example, [0085] and [0086] of the published version of Applicant’s patent application as support for this amendment.

In addition, Applicant responds to the rejections in the April 5, 2006 Office Action as if set forth in the September 5, 2006 Office Action.

### **Rejection – 35 USC §101**

Misnumbered claim 27 (correctly numbered as claim 1, now claim 20) was rejected as being directed to non-statutory subject matter.

Claim 20 has been written to recite an article of manufacture that includes at least one tangible medium having an enterprise directory configured for IP telephony embodied thereon. The material embodied on the tangible medium imparts functionality when employed as a computer component.

Rejection – 35 USC §102(e) of Misnumbered Claim 27 (Now Claim 20)

Misnumbered claim 27 (correctly numbered as claim 1, now claim 20) was rejected as being anticipated by Krishnaswamy. Applicant respectfully traverses the rejection.

As mentioned above with respect to the rejection under 35 USC §101, misnumbered claim 27 (now claim 20) has been amended to recite a computer readable medium on which an enterprise directory is tangibly embodied, “wherein the X.500-compatible enterprise directory is a directory of named objects, including users, network devices and network services.” Furthermore, a schema of the enterprise directory includes at least one object for representing a component of an IP telephony system, the component selected from a group consisting of: a GateKeeper; a Gateway; a Multipoint Control Unit (MCU); a GateKeeper Exchange; and a user with associated telephony service attributes. Thus, the X.500 compatible enterprise directory is “enhanced” to enable call routing features otherwise only previously available using database (i.e., table-based) data structures.

For example, Applicant’s specification discloses that the “network devices” of the enterprise directory may include “e.g. routers, gateways” and the “network services” of the enterprise directory may include “e.g. print servers.” That is, the enterprise directory is, for example, an industry-standard general purpose directory, extended with schema for controlling call routing features.

By contrast, the “directory services” of Krishnaswamy are disclosed as tables that “tracks the logged-in status and current IP address of the VNET user.” Krishnaswamy does not disclose or suggest that the “directory services” is “X.500 compatible,” let alone is “a directory of named objects, including users, network devices and network services.” Put simply, there is nothing in Krishnaswamy that discloses or suggests its “directory services” are for anything other than call routing and/or other telephone system control.

Turning now to the Examiner’s specific allegations, the Examiner recites in the Office Action that:

Krishnaswamy discloses a method of configuring an enterprise directory for IP telephony, the method comprising the steps of (a) providing an X.500 compatible directory (Fig. 1, RefDirectory server 1, 2 and 3)

Fig. 1 does not include the elements cited by the Examiner. The Examiner appears to be citing to “Dir SVE 1,” “DirSVE 2,” and “Dir SVE 3” in Fig. 10A.

There is nothing in Fig. 10A of Krishnaswamy, the text portion of Krishnaswamy corresponding to Fig. 10A, nor in any other portions of Krishnaswamy as best understood by Applicant, to indicate that Krishnaswamy discloses “an X.500 compatible enterprise directory” or any other industry standard enterprise directory. Nor is there anything to indicate that Krishnaswamy discloses any “enterprise directory” that is “a directory of named objects, including users, network devices and network services.”

For at least these reasons, then, it is respectfully submitted that claim 20 (corresponding to misnumbered claim 27 and to correctly numbered claim 1) is neither anticipated by nor obvious in view of Krishnaswamy.

Rejection – 35 USC §102(e) of Misnumbered Claims 176-177 (Now Claims 32-33)

Misnumbered claims 176-177 (correctly numbered as claims 13-14, now claims 32-33) were rejected as being anticipated by Curry. Applicant respectfully traverses the rejection.

Similar in some sense to the amendment of claim 20, claim 32 has been amended to recite that the provided directory server comprises “an enterprise directory that is a directory of named objects, including users, network devices and network services and having an extensible schema configured to provide data to support routing of telephone calls.”

The Examiner cited Fig. 6, Ref. 80 of Curry as allegedly disclosing providing a directory server. Similar to the directory servers of Krishnaswamy, however, the RAS (routing and administration server) 80 of Curry is “for managing call routing translations and user access permissions.” (Curry col. 12, lines 16-18). Nothing in Curry discloses or suggests that the RAS 80 or any other disclosed component is an “enterprise directory” that “is a directory of named objects, including users, network devices and network services and having an extensible schema configured to provide data to support routing of telephone calls.”

With particular regard to misnumbered claim 177, the Examiner alleges that “Curry discloses coupling an enterprise directory having an extensible schema to the IP network.” The schema according to which the Curry RAS operates is the primary (and one and only) schema according to which it operates – for managing call routing translations and user access permissions. The Curry RAS does not operate according to an “extensible schema” which is in addition to it being an “enterprise directory that is a directory of named objects, including users, network devices and network services”

For at least these reasons, then, it is respectfully submitted that claims 32-33 (corresponding to misnumbered claims 176-177 and to correctly numbered claims 13-14) are neither anticipated by nor obvious in view of Curry.

Rejection – 35 USC §103 of Misnumbered Claims 165-175 (Now Claims 21-31)

Misnumbered claims 165-175 (correctly numbered as claims 2-12, now claims 21-31) were rejected as being obvious over Guy in view of Rogers. Applicant respectfully traverses the rejection. (The Examiner references “Guy,” but also gives patent number 6870827, which is a patent to Voit. Based on the reference citations, it appears however that the Examiner meant to reference to Guy’s patent number 6298057, listed on the PTO-892. Applicant is proceeding on this assumption.)

Similar in some sense to the amendment of claims 20 and 32, claim 21 has been amended to recite that the provided directory server comprises “an enterprise directory that is a directory of named objects, including users, network devices and network services and having an extensible schema configured to provide data to support routing of telephone calls.”

Turning now to Guy, Guy does not disclose or suggest that the “master directory” is an enterprise directory that is a directory of named objects, including users, network devices and network services.” Rather, the master directory is disclosed as being for call control.

While the Examiner does not rely on or cite to Rogers as disclosing an enterprise directory, Applicant notes that Rogers does not in fact disclose or suggest an enterprise directory.

Rejection – 35 USC §103 of Misnumbered Claims 179-181 (Now Claims 35-37)

Misnumbered claims 179-181 (correctly numbered as claims 16-18, now claims 35-37) were rejected as being obvious over Curry. Applicant respectfully traverses the rejection.

Claim 176 (upon which claims 179-181 depend directly or indirectly) was rejected as being anticipated by Curry. It is respectfully submitted that claim 179-181 are patentable over Curry for at least the reasons discussed above for which claim 176 is patentable over Curry.

Rejection – 35 USC §103 of Misnumbered Claim 184 (Now Claim 38)

Misnumbered claim 184 (correctly numbered as claim 19, now claim 38) was rejected as being obvious over Guy in view of Rogers and Ranis. Applicant respectfully traverses the rejection.

Similar to other claims discussed above, claim 184 recites

directory services comprising an enterprise directory that is a directory of named objects, including users, network devices and network services and having an extensible schema configured to provide data to support routing of telephone calls and configured to provide data to support routing of telephone calls over the IP network including having an extensible schema including at least one IP telephony object

Furthermore, the enterprise directory is recited as:

wherein the enterprise directory services comprise at least one directory service selected from the group consisting of:  
a Novell Directory Services® (NDS);  
a Microsoft Active Directory Services® (ADS);  
an X.500 based directory-services;  
a Netscape® Directory Server; and  
a lightweight directory access protocol (LDAP) compatible directory-services.

As discussed above, neither of Guy or Rogers disclose or suggest such a feature.

Furthermore, neither does Rainis disclose or suggest such a feature. The Examiner contends that Rainis does in fact disclose such a feature. However, what Rainis discloses (at cited col. 11, lines 54-65) is that a database server forwards a query to other servers in a system until a server with the needed call routing information can be found. Rainis states that “This multi-tiered database model uses techniques similar to those used in Internet protocols such as Domain Name System (DNS) and Lightweight Directory Access Protocol (LDAP). However, this statement is not a disclosure or suggestion of LDAP at all, only a database that is stated to use techniques similar to those used in DNS and LDAP. Certainly, this statement is not a disclosure of enterprise directory services comprising an enterprise directory that is a directory of named objects, including users, network devices and network services and including an extensible schema configured to provide data to support routing of telephone calls and configured to provide data to support routing of telephone calls over the IP network ...”

## CONCLUSION

Applicants' believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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